morris*Wireless*™

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## 533 Woodruff Road Greenville South Carolina 29607

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FEB - 6 2006

ederal Communications Commission
Office of Secretary

February 3, 2006

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S. W. Washington D.C. 20554

RE: Certification of CPNI Filing EB-06-TC-060

Dear Ms. Dortch,

Please find attached compliance certificate and accompanying statement in accordance with the Commission's Public Notice, DC 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules for the year ended December 31, 2005

President & CEO

Morris Communications, Inc.

## morriswireless<sup>M</sup>

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Pederal Communications Commission.
Office of Secretary

## **CERTIFICATION**

I, H. A. Morris III hereby certify this 3<sup>rd</sup> day of February, 2006 that I am an officer of Morris Communications, Inc., and that I have personal knowledge that Morris Communication, Inc. has established operating procedures that are adequate to ensure compliance with the Consumer Proprietary Network Information rules set forth in 47 C.F.B 64.2001-2009.

H. A. Morris III President & CEO

Morris Communications, Inc.



## 533 Woodruff Road Greenville South Carolina 29607

Morris Communications, Inc. (Carrier) has established operating procedures that ensure compliance with the Federal Communications Commission regulations regarding the protection of Consumer Proprietary Network Information ("CPNI").

Carrier has implemented a system whereby the status of a customers CPNI approval can be determined prior to the use of CPNI. Customer approval for the use of CPNI will be done via paper and or electronic means. Customer approval must be submitted to the Credit Department and verified either through actual signature or electronic e-mail verification. All correspondence will be maintained at the corporate office.
Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier. Employees are given copies of the CPNI rules and are trained as to the correct and incorrect uses of CPNI. They are also told what the penalties are for the misuse and/or violation of CPNI as it relates to outbound sales and marketing.
Carrier maintains a record of its sales and marketing campaigns that require the use of its customers CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what procedures and services were offered as a part of the campaign. As a matter of general practice, Carrier has never used CPNI in any outbound sales or marketing campaign. However, in the event Carrier chooses to use CPNI for any future outbound sales or marketing campaign, the CPNI officer has been instructed to keep and maintain all pertinent records available for review at the corporate office.
Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI. As stated previously, Carrier has never used CPNI in any sales or marketing campaign, however, the CPNI officer has been trained as to the applicable rules governing the specific use of CPNI as it relates to outbound marketing efforts

on behalf of Carrier. Any records with regard to CPNI use will be maintained by the CPNI officer in

the corporate office.